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AT CORP COMMISSION

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

DOCKETED

JUN 05 2002

WILLIAM A. MUNDELL

Chairman

JIM IRVIN

Commissioner

MARC SPITZER

Commissioner

DOCKETED BY

IN THE MATTER OF RULES TO ADDRESS)
 SLAMMING AND OTHER DECEPTIVE)
 PRACTICES)
 _____)

Docket No: RT-00000J-99-0034

**ALLEGIANCE TELECOM'S
 COMMENTS ON PROPOSED
 SLAMMING AND
 CRAMMING RULES**

Pursuant to the Arizona Corporation Commission ("Commission") May 17, 2002
 Procedural Order, Allegiance Telecom of Arizona, Inc. ("Allegiance") files the following
 comments.

Allegiance supports the efforts of the Commission and the staff in proposing rules
 to protect the consumer, but Allegiance seeks two modifications and some clarification to
 the Proposed Rules.

First, Allegiance respectfully requests that the requirement that certain notices be in
 English and Spanish be limited to residential customers and not be required in transactions
 with business customers. Specifically, rules R14-2-1905(C) (letters of agency), R14-2-
 1906 (notice of change), R14-2-2005(C) (authorizations), and R14-2-2007(D) (notice of
 subscriber rights) should apply only to residential customers.

1 The requirement to produce certain notices and authorizations in both English and
2 Spanish will require significant investment and expense on the part of smaller carriers
3 such as Allegiance. While Allegiance understands the desire for the Commission to
4 require bi-lingual notices, the need for bilingual notices arises in the residential market,
5 not the business market.
6

7 Second, Allegiance is concerned about the script submission requirements found in
8 R14-2-1914 and R14-2-2012. While Allegiance would have argued that script
9 submissions are not necessary, it understands that the Commission has already ruled on
10 that point; however, these rules should be applied only to scripts provided to third party
11 marketing agents.
12

13 Finally, Allegiance respectfully requests that the Commission clarify that script
14 submissions only need to be made on an annual basis or after substantial amendment to the
15 script and that the Commission is not seeking pre-approval rights for such scripts. Of
16 equal importance, Allegiance requests that it be clarified that scripts are not required.
17 Allegiance does not use scripts now and does not believe that these rules were intended to
18 require the use of scripts. Allegiance believes that these changes are consistent with the
19 intention of the Commission.
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1 RESPECTFULLY SUBMITTED this 5th day of June, 2002.

2 LEWIS AND ROCA LLP

3 

4 Thomas H. Campbell
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7 Attorneys for Allegiance Telecom of Arizona,
8 Inc.

9 Original and ten (10) copies of
10 the foregoing hand-delivered
11 this 5th day of June, 2002, to:

12 The Arizona Corporation Commission
13 Utility Division – Docket Control
14 1200 W. Washington Street
15 Phoenix, Arizona 85007

16 Copy of the foregoing hand-delivered
17 this 5th day of June, 2002, to:

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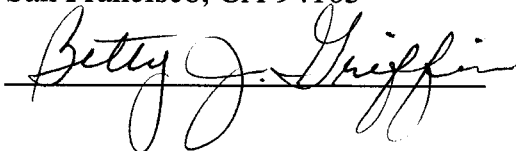
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